

EXHIBIT A

STATE OF INDIANA) IN THE MARION SUPERIOR COURT
)SS:
 COUNTY OF MARION) CAUSE NO.: _____

ACYRUS FLOYD, by ERICA)
 FLOYD, his Guardian)
 And ERICA FLOYD,)
 Individually,)
)
 Plaintiffs,)
)
 v.)
)
 RES-CARE, INC. and RESCARE)
 d/b/a COMMUNITY)
 ALTERNATIVES-ADEPT,)
)
 Defendants.)

**COMPLAINT FOR DAMAGES AND REQUEST
 FOR JURY TRIAL**

Come now the Plaintiffs, Acyrus Floyd by his guardian Erica Floyd and Erica Floyd, individually, by counsel, BENKIE & CRAWFORD, and for Plaintiffs' Complaint for Damages and Request for Trial by Jury, as against the Defendants ResCare and Rescare d/b/a Community Alternatives-Adept, state as follows:

1. Erica Floyd is the mother of Acyrus Floyd and the guardian of Acyrus Floyd.
2. That Acyrus Floyd is an adult and incapacitated person age twenty-six (26) and a resident of Marion County, Indiana, 2708 West 11th Street, Anderson, Indiana 46011.
3. That the Defendant, Res-Care, Inc. d/b/a Community Alternatives-Adept of Indianapolis is believed to be a foreign corporation, principally located at 805 N. Whittington Parkway, Suite 400, Louisville, Kentucky 40222; registered agent is believed to be CT Corporation System, 135 North Pennsylvania Street, Suite 1610, Indianapolis, Indiana 46204.

4. That the Defendant, Community Alternatives-Adept is believed to be a domestic corporation, principally located at 8044 Dartmouth Road, Indianapolis, Indiana 46260; registered agent is believed to be CT Corporation System, 135 North Pennsylvania Street, Suite 1610, Indianapolis, Indiana 46204.

5. That Acyrus Floyd was under the treatment and care of Res-Care d/b/a Community Alternatives-Adept (hereinafter referred to as “ResCare”) through its employees and agents for all times relevant to this Complaint.

6. That employees of ResCare were engaged in the systematic abuse and neglect of Acyrus Floyd for a period of many months beginning in 2020.

7. That ResCare failed to properly instruct, train and supervise its employees with respect to the care and treatment provided to Acyrus Floyd.

8. That ResCare failed to conduct a thorough and standard background check of its employees including criminal history, and negligently hired, and retained various employees who treated and cared for Acyrus Floyd at all times relevant to this Complaint.

9. That ResCare failed to properly supervise and monitor the care, and to recognize the neglect of Acyrus Floyd over a significant period of time to and including February of 2022.

10. That Acyrus Floyd was hospitalized on numerous occasions for the abuse and injuries he sustained at the hands of the employees of Rescare over a long period of time and the hospital reported these incidents and many are still being investigated.

11. That as a direct and proximate result of the aforementioned misconduct and negligent acts and omissions, by employees of ResCare, Acyrus Floyd was caused to sustain severe physical injuries, mental pain and suffering, emotional distress, mental injury, medical expenses and he continues to suffer future emotional distress and agony.

12. That as a direct and proximate result of the grossly negligent acts and omissions, and malicious and malevolent conduct of ResCare, Plaintiffs make claim for punitive damages.

WHEREFORE, Plaintiffs, Acyrus Floyd by his guardian Erica Floyd and Erica Floyd, individually, by counsel, respectfully request the Court find in favor of Plaintiffs and against the Defendants ResCare d/b/a Community Alternatives Adept, as to all issues raised in this Complaint and award Plaintiffs such damages in an amount which will fully and adequately compensate them for their losses, together with costs of this action, and for all other just and proper relief in the premises.

REQUEST FOR TRIAL BY JURY

Come now the Plaintiffs, Acyrus Floyd, by his guardian Erica Floyd and Erica Floyd, individually, by counsel, BENKIE & CRAWFORD, and respectfully requests that all issues raised in Plaintiffs' Complaint for Damages be tried before a Jury.

Respectfully submitted,

/s/ Scott A. Benkie

Scott A. Benkie, #4327-4971

BENKIE & CRAWFORD

The Inland Building

156 East Market Street, 2nd Floor

Indianapolis IN 46204

(317) 632-4448

Attorney for Plaintiffs, Acyrus Floyd by his
Guardian, Erica Floyd, and Erica Floyd,
Individually.